



April 12, 2024

VIA CM/ECF

Hon. Jennifer H. Rearden
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Sound Around, Inc. v. Friedman et al.*
Case No. 1:24-cv-01986

Dear Judge Rearden:

This firm represents Defendants Moises Friedman, Shulim Eliezer Ilowitz, ML Imports, Inc., CYRF, Inc., LRI Group, LLC, MDF Marketing Inc., and World Group Import, LLC (“Defendants”) in the above-referenced matter. We respectfully submit this letter motion, pursuant to Section 2(E) of Your Honor’s Individual Rules and Practices in Civil Cases, to request an extension of time to May 17, 2024 for Defendants to respond to Plaintiff Sound Around, Inc. (“Plaintiff”)’s Complaint. The reason for the request is that counsel for Defendants requires additional time to familiarize themselves with the voluminous allegations in the Complaint and, due to the various dates of service of process, prefers to respond on behalf of all of our clients on one date. We have requested the consent of counsel for Plaintiff to this request, which was granted, as indicated on the Stipulation Extending Certain Defendants’ Time to Respond to Plaintiff’s Complaint and Acknowledgement of Service annexed hereto.

Defendant World Group Import, LLC’s current time to respond to Plaintiff’s Complaint is April 23, 2024. Defendants Moises Friedman and MDF Marketing, Inc.’s current time to respond to Plaintiff’s Complaint is April 24, 2024. Defendants Shulim Eliezer Ilowitz, ML Imports, Inc., CYRF, Inc., and LRI Group, LLC have not yet been served but acknowledge service as of April 11, 2024, setting their time to respond to Plaintiff’s Complaint at May 2, 2024.

This is the first such request for an extension of time to respond to Plaintiff’s Complaint. There are no pending deadlines or current appearances before Your Honor in this matter. Thank you for your consideration.

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Sincerely,

/s/Megan J. Muoio

Megan J. Muoio

Encl.

cc: Marisa Marinelli, counsel for Plaintiff (via CM/ECF)

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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SOUND AROUND, INC.,	:	:	
	:	:	
Plaintiff,	:	:	Case No.: 1:24-cv-01986
	:	:	
v.	:	:	
	:	:	
MOISES FRIEDMAN, SHULIM ELIEZER	:	:	STIPULATION EXTENDING
ILOWITZ, ML IMPORTS, INC., CYRF, INC.,	:	:	CERTAIN DEFENDANTS'
LRI GROUP, LLC, EXECUTIVE SERVICES,	:	:	TIME TO RESPOND TO
EXECUTIVE LAUNDRY, LLC, MDF	:	:	PLAINTIFF'S COMPLAINT
MARKETING, INC., WORLD GROUP	:	:	AND ACKNOWLEDGEMENT
IMPORT, LLC, HEFEI PAIDONG OUTDOOR	:	:	OF SERVICE
PRODUCTS CO., LTD.,	:	:	
	:	:	
Defendants.	:	:	
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IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for Plaintiff SOUND AROUND, INC. ("Plaintiff") and Defendants MOISES FRIEDMAN, SHULIM ELIEZER ILOWITZ, ML IMPORTS, INC., CYRF, INC., LRI GROUP, LLC, MDF MARKETING, INC., and WORLD GROUP IMPORT, LLC ("Defendants") that (1) Defendants MDF Marketing, Inc. and Moises Friedman do hereby acknowledge service of the Summons and Complaint as of April 3, 2024; Defendant World Group Import, LLC hereby acknowledges service of the Summons and Complaint as of April 2, 2024; and Defendants Shulim Eliezer Ilowitz, ML Imports, Inc., Cyre, Inc., and LRI Group, LLC hereby acknowledge service of the Summons and Complaint as of April 11, 2024; and (2) the Defendants' time to respond to Plaintiff's Complaint is hereby extended to and including May 17, 2024.

IT IS FURTHER STIPULATED AND AGREED that this Stipulation may be executed in counterparts, with PDF and electronic signatures deemed to be original signatures.


Dated: April 11, 2024

HOLLAND & KNIGHT, LLP

By: 
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